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**UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA  
SAN FRANCISCO DIVISION**

**IN RE GOOGLE PLAY STORE  
ANTITRUST LITIGATION**

Case No. 3:21-md-02981-JD

**THIS DOCUMENT RELATES TO:**

*In re Google Play Consumer Antitrust  
Litigation*, Case No. 3:20-cv-05761-JD

*State of Utah et al. v. Google LLC et al.*,  
Case No. 3:21-cv-05227-JD

**NOTICE OF EXECUTED  
SETTLEMENT AND STIPULATED  
[PROPOSED] ORDER REGARDING  
DATE FOR FILING MOTION TO  
GIVE NOTICE OF PROPOSED  
PARENS PATRIAE SETTLEMENT**

Judge: Hon. James Donato

Plaintiffs in *State of Utah et al. v. Google LLC et al.*, Case No. 3:21-cv-05227-JD (“States”), Plaintiffs in *In re Google Play Consumer Antitrust Litigation*, Case No. 3:20-cv-05761-JD (“Consumers”), and Defendants Alphabet Inc., Google LLC, Google Ireland Limited, Google Commerce Limited, Google Asia Pacific Pte. Limited, and Google Payment Corp. (collectively, “Google”), state as follows:

**RECITALS:**

1. On September 5, 2023, States, Consumers, and Google (“Settling Parties”) notified the Court that they had reached an agreement in principle to settle this case. (MDL Dkt. 596.)
2. At the October 12, 2023 status conference, the Settling Parties notified the Court that the attorneys general in 53 jurisdictions had approved the settlement and a final executed copy was being prepared.
3. After the October 12, 2023 status conference, the Court entered an order directing the States “to file a notice once the settlement agreement has been executed in full, and the Court will set a date for the approval motion.” (MDL Dkt. 677 at 1.) The Court also stated that it was “amenable to Google’s request that the filing be deferred until the jury trial has concluded.” (*Id.*)
4. The Settling Parties have now finalized their settlement and executed it in full, and are preparing to file a Motion to Give Notice of Proposed *Parens Patriae* Settlement in accordance with 15 U.S.C. § 15c(c).

**NOW, THEREFORE, IT IS STIPULATED AND AGREED, SUBJECT TO THE APPROVAL OF THE COURT:**

1. The Settling Parties will file a Motion to Give Notice of Proposed *Parens Patriae* Settlement on December 8, 2023, or seven (7) calendar days after the jury renders its verdict in *Epic Games Inc. v. Google LLC et al.*, Case No. 3:20-cv-05671-JD, whichever is later. If the date for filing falls during the week of December 25, 2023, the Settling Parties

will file on January 5, 2024.

DATED: November 17, 2023

Respectfully submitted,

**BARTLIT BECK LLP**

Karma M. Giulianelli

**KAPLAN FOX & KILSHEIMER LLP**

Hae Sung Nam

By: /s/ Karma M. Giulianelli

Karma M. Giulianelli

*Co-Lead Counsel for Consumer Plaintiffs in In  
re Google Play Consumer Antitrust Litigation*

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By: /s/ Glenn D. Pomerantz

Glenn D. Pomerantz

*Counsel for Defendants Google LLC et al.*

**PURSUANT TO STIPULATION, IT IS SO ORDERED.**

Dated: \_\_\_\_\_

\_\_\_\_\_  
United States District Judge

**E-FILING ATTESTATION**

I, Brian Wang, am the ECF User whose ID and password are being used to file this document. In compliance with Civil Local Rule 5-1(i)(3), I hereby attest that each signatory identified above has concurred in this filing.

/s/ Brian Wang  
Brian Wang